

1 AARON D. FORD
Nevada Attorney General
2 CHARITY F. FELTS
Senior Deputy Attorney General
3 Nevada Bar No. 10581
GERALD L. TAN
4 Deputy Attorney General
Nevada Bar No. 13596
5 State of Nevada
Office of the Attorney General
6 5420 Kietzke Lane, Suite 202
Reno, NV 89511
7 (775) 687-2121 (phone)
(775) 688-1822 (fax)
8 Email: cfelts@ag.nv.gov
gtan@ag.nv.gov
9 *Attorneys for Defendants, State of Nevada-*
Division of Public and Behavioral Health,
10 *Joanne Malay, Jackie Arellano*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 DOCTOR AARON BOMER, an individual,

14 Plaintiff,

15 v.

16 STATE OF NEVADA-DIVISION OF
PUBLIC AND BEHAVIORAL HEALTH
17 (SOUTHERN NEVADA ADULT MENTAL
HEALTH SERVICES, a division of the State
18 of Nevada; JOANNE MALAY, an
individual, JACKIE ARELLANO, an
19 individual, JENNIFER SEXTON, and
individual,
20

21 Defendants.

Case No. 2:20-cv-00182-JCM-BNW

STIPULATION, REQUEST, AND
ORDER EXTENDING TIME TO
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF'S FIRST AMENDED
COMPLAINT
(FIRST REQUEST)

22
23 Defendants, STATE OF NEVADA-DIVISION OF PUBLIC and BEHAVIORAL
24 HEALTH (SOUTHERN NEVADA ADULT MENTAL HEALTH SERVICES), and JOANNE
25 MALAY, and JACKIE ARELLANO, by and through their attorneys, AARON D. FORD,
26 Attorney General for the State of Nevada, CHARITY F. FELTS, Deputy Attorney General, and
27 GERALD L. TAN, Deputy Attorney General, pursuant to LR IA 6-1, LR IA 6-2, hereby submit
28 their Stipulation, Request, and Order Extending Time to Answer or Otherwise Respond to

1 Plaintiff's First Amended Complaint. This is the first request for an extension of time to file an
2 answer or otherwise respond to Plaintiff's First Amended Complaint.

3 Plaintiff Doctor Aaron Bomer filed a Complaint (ECF No. 1) on January 24, 2020.
4 Plaintiff filed a First Amended Complaint (ECF No. 3) on January 29, 2020. Plaintiff's
5 complaint includes multiple defendants, including individual defendants. These Defendants
6 have been served on various and different dates, with the deadline for Defendant Jackie
7 Arellano to answer or otherwise respond to the First Amended Complaint being February 27,
8 2020, and other responsive deadlines being March 5, 2020, and March 6, 2020. This Stipulation
9 and Order is being filed prior to the initial February 27, 2020, deadline.

10 The parties desire to set one date on which an answer or other responsive pleading from
11 these Defendants is due. Additionally, this extension is requested by Defendants' counsel to
12 allow sufficient time to confer with the clients regarding the allegations set forth in the First
13 Amended Complaint and to properly prepare an answer or other responsive pleading. Plaintiff,
14 at this initial stage of the case, will not be prejudiced by the extension of time.

15 Upon agreement by and between the parties, through their respective counsel, the
16 undersigned counsel request this Court grant Defendants an extension of time, up to and
17 including March 20, 2020, to file an answer or otherwise respond to Plaintiff's First Amended
18 Complaint.

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 By entering into this stipulation, none of the parties waive any rights they have under
2 statute, law, or rule with respect to Plaintiff's First Amended Complaint.

3 DATED: February 21, 2020

4 AARON D. FORD
5 Attorney General

MULLINS & TRENCHAK

6 By: /s/ Charity F. Felts
7 CHARITY F. FELTS
8 Deputy Attorney General
9 Nevada Bar No. 10581
10 GERALD L. TAN
11 Deputy Attorney General
12 Nevada Bar No. 13596
13 Office of the Attorney General
14 5420 Kietzke Lane, Suite 202
15 Reno, NV 89511
16 (775) 687-2141 (phone)
17 (775) 688-1822 (fax)
18 Email: cfelts@ag.nv.gov
19 gtan@ag.nv.gov

By: /s/ Philip P. Trenchak
PHILIP J. TRENCHAK, Esq.
Nevada Bar No. 9924
VICTORIA C. MULLINS, Esq.
Nevada Bar No. 13546
1614 S. Maryland Parkway
Las Vegas, Nevada 89104
(702) 778-9444
(775) 778-9449 (fax)
Email: phil@mullinstrenchak.com

Attorneys for Plaintiff Doctor Aaron Bomer

15 *Attorneys for Defendants, State of Nevada-*
16 *Division of Public and Behavioral Health,*
17 *Joanne Malay, Jackie Arellano*

18 **IT IS SO ORDERED**

19
20 **DATED: February 24, 2020**

21
22 

23 _____
24 **BRENDA WEKSLER**
25 **UNITED STATES MAGISTRATE JUDGE**
26
27
28